

I would like to file the following comment in favor of retaining the telegraphy requirement for the Amateur Extra Class operator license.

It is true that there is no longer an international treaty requirement for testing for telegraphy proficiency. And it is also true, as the Commission has noted (paragraph 20), "... that most amateur radio operators who choose to provide emergency communication do so using voice or digital modes of communication . . .". But does it necessarily follow from this that telegraphy has no conceivable use in the future? Is it actually in the best interest of the United States to encourage the ultimate demise of telegraphy? Commercial and military use of telegraphy has pretty much died out, so the only remaining reservoir of telegraphy operators is within the ranks of amateur radio. By completely eliminating the telegraphy requirement, you might be taking a major step towards the ultimate depletion of this last reservoir. I don't understand how this could be in the public interest. Why not take a more conservative approach?

The Commission is quite correct when arguing (paragraph 19) that: "Moreover, given that there is no requirement that a licensee who has passed a telegraphy examination actually use telegraphy for communications or otherwise maintain proficiency, successful completion of a one-time telegraphy examination offers no guarantee of future proficiency." However, I would like to point out that successful completion of a one-time telegraphy examination does at least guarantee that the licensee has been exposed to telegraphy. Such exposure is a necessary condition for the survival of at least a small reservoir of proficient telegraphy operators.

Therefore, it seems to me that it would be in the public interest to retain the telegraphy requirement for the Amateur Extra Class operator license. At the same time I am willing to concede (reluctantly) that it might be in the public interest to eliminate the telegraphy requirement for the General Class license, because this requirement arguably discourages otherwise highly qualified individuals from becoming amateur radio operators. But I don't see why these individuals would be so discouraged by a telegraphy requirement for the Extra Class only, considering the scope of the operating privileges granted by the General Class license.

For the record, I have held an Amateur Extra Class operator license since 1977. My call-sign is N5DY, also issued in 1977.

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